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9	BEFORE THE	
10	BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS	
11	STATE OF C	CALIFORNIA
12	In the Matter of the Accusation Against:	Case No. 2013-632
13	SHAUNDER LUVETTE THOMPSON	,
14	a.k.a. SHAUNDER LUVETTE DAVIS, a.k.a. SHAUNDER LUVETTE CHILLIS	ACCUSATION
15	7625 Chesteridge Cove, Apt. 53-B Southaven, Mississippi 38671	
16	Registered Nurse License No. 817676	
17	Respondent.	
18		·
19	Complainant alleges:	
20	<u>PARTIES</u>	
21	1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her	
22	official capacity as the Executive Officer of the Board of Registered Nursing, Department of	
23	Consumer Affairs.	
24	2. On or about April 3, 2012, the Board of Registered Nursing (Board) issued	
25	Registered Nurse License Number 817676 to Shaunder Luvette Davis, currently known as	
26	Shaunder Luvette Thompson, and a.k.a. Shaunder Luvette Chillis (Respondent). The Registered	
27	Nurse License was in full force and effect at all times relevant to the charges brought herein and	
28	will expire on September 30, 2013, unless renewed.	
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JURISDICTION

- 3. This Accusation is brought before the Board under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.
- 4. Code section 2750 provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.
- 5. Code section 2764 provides that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811(b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.

STATUTORY PROVISIONS

- 6. Section 2761 of the Code states in relevant part(s) that the board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:
 - (a) Unprofessional conduct, which includes, but is not limited to, the following:
- (4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action.

COST RECOVERY

7. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case, with failure of the licentiate to comply subjecting the license to not being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be

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included in a stipulated settlement.

FIRST CAUSE FOR DISCIPLINE

(Unprofessional Conduct - Out of State Discipline) (Bus. & Prof. Section 2761, subd. (a)(4))

8. Respondent is subject to disciplinary action under Code section 2761, subdivision (a)(4), in that on or about June 8, 2012, in a disciplinary action before the Mississippi Board of Nursing (Mississippi Board), the Mississippi Board entered an Agreed Order for Legal Aspects of Nursing Course/Formal Reprimand/Fine against Respondent's license to practice nursing in the State of Mississippi. Respondent agreed to comply with the terms of the Mississippi Board's Order with the understanding that failure to do so would give the Mississippi Board access to her entire investigative file in subsequent proceedings. The circumstance underlying this discipline are that on or about December 3, 2010, while working as a nurse at DSI Renal in Memphis, Tennessee, Respondent called in a prescription without a Physician's approval to do so.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

- 1. Revoking or suspending Registered Nurse License Number 817676, issued to Shaunder Luvette Thompson, a.k.a. Shaunder Luvette Davis, a.k.a. Shaunder Luvette Chillis;
- 2. Ordering Shaunder Luvette Thompson, a.k.a. Shaunder Luvette Davis, a.k.a. Shaunder Luvette Chillis, to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;
 - 3. Taking such other and further action as deemed necessary and proper.

DATED: FEBRUARY 20, 2013

LQUISE R. BAILEY, M.ED., RN

Executive Officer, Board of Registered Nursing

Department of Consumer Affairs

State of California

Complainant

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